

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

\*\*\*\*\*

UNITED STATES OF AMERICA, \*

\*

-- vs. -- \*

Criminal Number 12-CR-033-01-PB

\*

CRAIG FAULKNER, \*

\*

Defendant. \*

\*\*\*\*\*

**[ASSENTED TO]**  
**MOTION TO CONTINUE PRETRIAL AND TRIAL**

1. ] The Defendant, Craig Faulkner, in the above captioned matter, respectfully **MOVES** that this Honorable Court **CONTINUE** both the **PRETRIAL CONFERENCE**, now scheduled for July 31, 2012, and the **TRIAL**, now scheduled for August 21, 2012, to dates, at least, ninety [90] days into the future, excluding the month of December, 2012, so that the Defendant may obtain Discovery, which is ion the process of being provided to this Defendant, so that the Defendant may prepare defenses to the crimes charged, so that the Government and the Defendant may continue their efforts toward a non trial disposition, and so that recently obtained counsel may have the time to prepare.

2. ] All of the parties to these matters have been consulted with and conferred with and have **ASSENTED TO THIS CONTINUANCE**.

3. ] The Defendant is in custody and has been mailed a waiver of his constitutional statutory rights to speedy trial, which will be filed with this Court as soon as it is executed and returned to counsel. The Defendant has orally assented hereto.

4. ] Assistant United States Attorney Jennifer Davis **ASSENTS** to this Motion.

5. ] The Defendant, Wendy Ford, **ASSENTS** to this motion, by her counsel, Attorney Theodore Lothstein.

6. ] The Defendant ,Craig Ford, ASSENTS to this motion, by his counsel, Attorney Behzad Mirhashem.

7. ] The Defendant, Sharon Cote, ASSENTS to this motion, by his counsel, Attorney Charles Keefe.

8. ] No supporting memorandum of law accompanies this motion, as it is unopposed and all parties assent to this motion.

9. ] It is in the best interests of justice to allow the Defendant's counsel the opportunity to obtain and review the extensive discovery that comprises this case and the charges made, so that a proper representation of the Defendant may be made.

**WHEREFORE**, the Defendant, Craig Faulkner, **MOVES** that this Honorable Court **CONTINUE** both the **PRETRIAL CONFERENCE**, now scheduled for July 31, 2012, and the **TRIAL**, now scheduled for August 21, 2012, to dates, at least, ninety [90] days into the future.

**CERTIFICATE OF SERVICE**

I hereby certify under oath and under the pains and penalties of perjury that I served the above pleading to those parties appearing in this action by service electronically thereto and by mailing the same, postage prepaid, by first class mail to those not appearing electronically, including, but not limited to all pro se parties.

Respectfully submitted,  
Craig Faulkner,  
By His Attorneys,  
Paul J. Garrity, Esquire  
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Signature Valid Joseph S. Provanzano, Esquire  
Digitally Signed By Joseph S. Provanzano, Esquire  
DN CN = Joseph S. Provanzano, Esquire C = US

Date : 2012.07.20 02:55:02-05'00'

/s/ Joseph S. Provanzano, Esquire

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Joseph S. Provanzano, Esquire

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Date : Friday, July 20, 2012

File : P09-2700